

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re)
) Chapter 15
IIG Trade Opportunities Fund N.V.¹)
) Case No. 20-10666 (MEW)
Debtor in a foreign proceeding.)
)

**NOTICE OF FILING AND HEARING ON PETITION SEEKING RECOGNITION OF
FOREIGN PROCEEDING AND RELATED RELIEF PURSUANT TO CHAPTER 15 OF
THE UNITED STATES BANKRUPTCY CODE**

PLEASE TAKE NOTICE that on March 2, 2020, Ms. V. P. Maria LLM, in her capacity as court-appointed bankruptcy trustee of IIG Trade Opportunities Fund N.V. (“**IIG TOF**” or the “**Fund**”), and foreign representative (the “**Foreign Representative**” or the “**Trustee**”) of IIG TOF’s Liquidation proceeding (the “**Curaçao Liquidation**”) currently pending before the Court of First Instance of Curaçao (the “**Curaçao Court**”) pursuant to the *Faillissementsbesluit 1931* (as amended, the “**Curaçao Bankruptcy Act**”), by her United States attorneys, Reed Smith LLP, filed the *Chapter 15 Petition for Recognition of a Foreign Proceeding* and the *Verified Petition Under Chapter 15 for Recognition of a Foreign Main Proceeding and Related Relief* (together, the “**Petition**”) for IIG TOF pursuant to chapter 15 of title 11 of the United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the Southern District of New York (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that the Foreign Representative seeks the entry of an order finding that (i) IIG TOF is eligible to be a “debtor” under chapter 15 of the Bankruptcy Code, (ii) the Curaçao Liquidation is a foreign main proceeding within the meaning of section 1502 of the Bankruptcy Code, (iii) the Foreign Representative satisfies the requirements of a “foreign representative” under section 101(24) of the Bankruptcy Code, (iv) the Petition was properly filed and meets the requirements of section 1515 of the Bankruptcy Code, (v) granting recognition of the Curaçao Liquidation as a “foreign main proceeding” under sections 1517 and 1520 of the Bankruptcy Code, (vi) granting certain additional relief under sections 1507 and 1521 of the Bankruptcy Code, and (vii) granting such other related relief as is just and proper under the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Court has scheduled a hearing (the “**Hearing**”) to consider the relief requested in the Petition for **10:00 a.m. (prevailing Eastern Time) on March 31, 2020** in Room 617 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004.

¹ The last four digits of IIG TOF’s company number are (5220). IIG TOF’s registered office is Blenchiweg 23, Curaçao.

PLEASE TAKE FURTHER NOTICE that copies of the Petition and all documents filed in this chapter 15 case are available to parties in interest on (i) the Foreign Representative's Website at <https://vpm-law.com/iig-trade-opportunities-fund/>, (ii) the Court's Electronic Case Filing System, which can be accessed from the Court's website at <http://www.nysb.uscourts.gov> (a PACER login and password are required to retrieve a document), or (iii) upon written request to the Foreign Representative's counsel (including by facsimile or e-mail) addressed to:

REED SMITH LLP
599 Lexington Avenue
New York, NY 10022
Telephone: (212) 521-5400

Attn: Aaron Javian
ajavian@reedsmith.com
Christopher P. Hoffman
choffman@reedsmith.com

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response or objection to the Petition must do so in writing and in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, setting forth the basis for such response or objection with specificity and the nature and extent of the respondent's claims against IIG TOF. Such responses or objections must be filed electronically with the Court by registered users of the Court's electronic case filing system in accordance with General Order M-399 and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of each of which may be viewed on the Court's website at <http://www.nysb.uscourts.gov>) and by all other parties in interest, on a compact disc in Portable Document Format (PDF), Microsoft Word, or any other Windows-based word processing format, which disc shall be sent to the Office of the Clerk of the Court, One Bowling Green, New York, New York 10004-1408. A hard copy of any response or objection shall be served upon counsel for the Foreign Representative, Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (Attn: Aaron Javian and Christopher P. Hoffman), so as to be actually received on or before **March 24, 2020**.

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed to the Petition must appear at the Hearing at the time and place set forth above.

PLEASE TAKE FURTHER NOTICE that, at the Hearing, the Court may order the scheduling of a case management conference to consider the efficient administration of the cases.

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Court may grant the relief requested in the Petition without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the Hearing may be adjourned from time to time without further notice other than an announcement in open court, or a notice of adjournment filed with the Court, of the adjourned date or dates at the hearing or any other further adjourned hearing.

Dated: March 5, 2020
New York, New York

Aaron Javian
Christopher P. Hoffman
Nicole Lech
REED SMITH LLP
599 Lexington Avenue
New York, New York 10022

Counsel to the Foreign Representative